

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE GRAND JURY SUBPOENA  
PROCEEDING v. CORREIA, et al

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) Docket No. 05-MC-10206-MBB  
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**ASSENTED-TO MOTION FOR MODIFICATION OF RELEASE CONDITIONS**

The material witnesses in the above-captioned matter (the "Witnesses"), identified in the attached Pretrial Services Memorandum, dated May 20, 2005, hereby move the Court to modify the conditions of their release.

The Witnesses currently are being housed at the Holiday Inn at 225 McClellan Highway, Boston. The Witnesses respectfully request that they be relocated to the Mariners House at 11 North Square, Boston. The Mariners House will provide the Witnesses with more suitable lodging and will provide them with easier access to counsel. All other conditions of release will remain in place. If this Motion is granted, the Witnesses will be relocated on Wednesday, May 25, 2005.

Pretrial Services has no objection to this Motion. The United States Attorney's Office has assented to it.

WHEREFORE, the Witnesses respectfully request that this Motion be granted.

Respectfully submitted,

Maurice Correia  
Joe Cherian  
Jagdish Chand  
Raj Rajesh Fernando  
Ranjish Mukulam  
Menom M. Sivadas  
Ankur Srivastav

By their attorneys,

/s/ Douglas S. Brooks

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Dated: May 24, 2005

# EXHIBIT A



## MEMORANDUM

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**To:** Honorable Marianne B. Bowler, U.S. Magistrate Judge

**From:** David A. Picozzi, U.S. Pretrial Services Officer

**Re:** MATERIAL WITNESSES (See List)

**Date:** May 20, 2005

On May 20, 2005 Pretrial Services Officer, David Picozzi and EM Christopher Wylie conducted interviews of the above listed material witnesses. Each individual was represented by counsel throughout the interview process. Due to the extensive number of interviews and time constraints, regretfully we are unable to provide pretrial reports at this time.

After consulting with counsel, Pretrial Services would suggest the following conditions of release be imposed for each individual named in this matter:

Personal Recognizance

Maintain residence as designated by the Court

Report to pretrial services as directed

Surrender all passports and travel documents to Pretrial Services

Travel is restricted to the Metropolitan Boston area

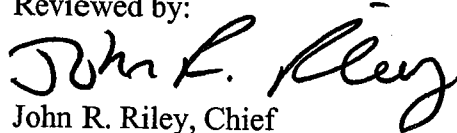
No access to any points of egress (ie. airport terminals, train stations, ports of call)

Notify Pretrial of any new arrests and contacts with law enforcement within 24 hours

Statutory conditions of release

DAP/lis

Reviewed by:



John R. Riley, Chief

U.S. Pretrial Services Officer

**MATERIAL WITNESSES**  
**In Re Grand Jury Proceeding (M/V MSC Elena)**

| <i>Name</i>        | <i>Rank</i>     | <i>Attorney</i> | <i>Birth Date</i> | <i>Passport or Seaman's Passport No.</i> |
|--------------------|-----------------|-----------------|-------------------|--|
| Maurice Correia    | Motorman        | Frank Libby     | 11/17/1968        | A2877062                                 |
| Joe Cherian        | Wiper           | Frank Libby     | 10/04/1979        | A9799308                                 |
| Jagdish Chand      | Third Engineer  | Frank Libby     | 10/25/1963        | A1081043                                 |
| Raj Rajesh Fernado | Motor Man       | Frank Libby     | 02/10/1969        | A4001683                                 |
| Aman R. Mahana     | Second Engineer | Peter Ball      | 03/08/1976        | E3839434                                 |
| Ranjish Mukulam    | Fourth Engineer | Frank Libby     | 05/03/1975        | B0053778                                 |
| Mani Singh         | Chief Engineer  | Josh Levy       | 06/10/1948        | E4397396                                 |
| Menom M. Sivadas   | Master          | Frank Libby     | 07/31/1953        | F3368599                                 |
| Ankur Srivastav    | Junior Engineer | Frank Libby     | 02/24/1982        | E8349845                                 |